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April 14, 2025

**VIA ECF**

Hon. Valerie E. Caproni  
United States District Judge  
United States District Court  
Southern District New York  
40 Foley Square, Room 240  
New York, New York 10007

**MEMO ENDORSED**

**Re: D’Anzieri v. Harrison Global LLC d/b/a DavEl | BostonCoach et al.  
United States District Court for the Southern District of New York  
No.: 21 Civ. 8506 (VEC)**

Dear Judge Caproni:

We represent defendants Harrison Global LLC d/b/a DavEl | BostonCoach and Steven Pitel (“Defendants”) in the above-referenced matter. As per the Court’s Order dated April 9, 2025 at Dkt. #151, Defendants respectfully submit this letter motion for an Order pursuant to Rule 12(f) of the Federal Rules of Civil Procedure striking Defendants’ filings at Dkts. 131, 135 and 143 in light of Defendants revised filings at Dkt. # 152, 153 and 154. Specifically, as instructed by the Order, Defendants have re-filed: (1) the Declaration of Jan Lofgren at Dkt. 131 without Exhibit A or the portion cited in paragraph 5 that relies on Exhibit A (*see* re-filed declaration at Dkt. 152); (2) under seal, the Consolidated Rule 56.1 Statement at Dkt. 135 without the language at ¶¶ 141, 145, 147, 148 referenced in the Order (*see* re-filed statement at Dkt. 153); and (3) the Redacted Consolidated Rule 56.1 Statement at Dkt. 143 without the language at ¶¶ 141, 145, 147, 148 referenced in the Order (*see* re-filed statement at Dkt. 154).

Thank you for your consideration of this matter.

Respectfully submitted,

**GOLDBERG SEGALLA LLP**

/s/ Joanne J. Romero  
Joanne J. Romero

Cc: Kenneth Goldberg, Esq. Via ECF

Application GRANTED. The Clerk of Court is respectfully directed to strike the filings at Dkts. 131, 135, and 143.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written in a cursive style.

4/15/2025

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE